REMARKS

The Office Action mailed June 16, 2004 has been received and the Examiner's comments carefully reviewed. Claims 1-33 were pending before submission of this paper. Claims 1-33 were rejected by the Office Action. Claims 1, 3, 6, 8-13, 15, 17-21, 24, 26, and 27 are amended. Claims 4 and 28-33 are cancelled. No new matter has been added. Claims 1-3 and 5-27 are currently pending in this application. For at least the following reasons, Applicants respectfully submit that the pending claims are in condition for allowance.

Rejection of Claims 29, 31 and 33

The Office Action rejected claims 29, 31 and 33 under 35 U.S.C 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants have cancelled Claims 29, 31 and 33. Thus, this rejection is moot in view of the cancelled claims.

Rejection of Claims 1-33

The Office Action rejected Claims 1, 10, and 19 under 35 U.S.C 102(e) as being anticipated by U.S. Patent 6,108,027 issued to *Andrews*. The Office Action rejected Claims 2, 11, and 20 under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent 5,828,414 issued to *Perkins*. Claims 3, 4, 12, 13, 21, and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent 5,212,772 issued to *Masters*. The Office Action rejected Claims 5, 14, and 23 under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent 6,615,370 issued to *Edwards*. Claims 6, 15, and 24 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent Re. 31,903 issued to *Faillace*, and further in view of *Edwards*. Claims 7, 16, and 25 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent 6,339,616 issued to *Kovalev*. Claims 8, 17, and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of *Faillace*, further in view of *Edwards*, and further in view of U.S. Patent 6,106,571 issued to *Maxwell*. Claims 9, 18, and 27 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Maxwell* in view of *Faillace*, further in view of *Bodnar*, and further in view of *Andrews*. Claims 28-33 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of *Faillace*, and further in view of *Kovalev*.

Claim 1, as amended, is submitted to be allowable at least because the prior art of record does not disclose, teach, or suggest "collecting the data to be compressed using at least one probe; determining difference information as a function of the type of data to be compressed; responding to the difference information satisfying a size constraint by encoding the difference information with reference to a set of commonly occurring difference values for a type of the data to be compressed; accumulating the difference information in a buffer; and compressing the difference information such that the type of probe is independent of the type of data to be compressed," as recited in Applicants' Claim 1.

The Office Action cites *Andrews* at column 1, lines 56-62 to show that Claim 1 is anticipated. *Andrews* is directed to the transmission of a still image. Specifically, *Andrews* teaches that difference information representing the difference between a stored image and a still image is computed and encoded in a format that can be processed at a remote location. The encoded difference information is output for transmission over a communications channel. A second image is constructed from the stored image and the difference information. The second image has a quality higher than the quality of the first image and is stored in the memory. This process is repeated, increasing the resolution of the second image with each iteration until the desired quality is achieved.

Neither *Andrews*, the other cited references, nor any combination thereof, teach "collecting the data to be compressed using at least one probe; determining difference information as a function of the type of data to be compressed; responding to the difference information satisfying a size constraint by encoding the difference information with reference to a set of commonly occurring difference values for a type of the data to be compressed; accumulating the difference information in a buffer; and compressing the difference information such that the type of probe is independent of the type of data to be compressed." Specifically, none of the cited references, alone or in combination, teach "compressing the difference information such that the type of probe is independent of the type of data to be compressed." Thus, Claim 1 is submitted to be allowable, and notice to that effect is solicited.

Claims 9, 10, 18, 19 and 27, as amended, include limitations substantially similar (albeit different in other important ways) to the limitations claimed in Claim 1. As discussed above, Claim 1 is submitted to be allowable. Thus, Claims 9, 10, 18, 19 and 27 are allowable for at least the same reasons that Claim 1 is allowable, and notice to that effect is solicited.

Furthermore, dependent Claims 2, 3, 5-8, 11-17 and 20-26 are allowable for at least the same reasons that the base claims on which they rely are allowable, and notice to that effect is solicited.

Conclusion

It is respectfully submitted that each of the presently pending claims (Claims 1-3 and 5-27) are in condition for allowance and notification to that effect is requested. The Examiner is invited to contact Applicants' representative at the below-listed telephone number if it is believed that prosecution of this application may be assisted thereby. Although certain arguments regarding patentability are set forth herein, there may be other arguments and reasons why the claimed invention is patentably distinct. Applicants reserve the right to raise these arguments in the future.

Respectfully submitted,

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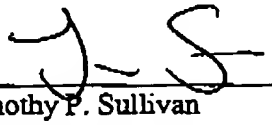

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